

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
www.flsb.uscourts.gov

In re:

Chapter 11 Cases

MBMG Holding, LLC,

Case No. 24-20576-CLC

Debtor.

EX-PARTE MOTION TO APPEAR *PRO HAC VICE*

I, Michael I. Goldberg (“Movant”), of the law firm Akerman LLP, a member in good standing of the bar of the United States District Court for the Southern District of Florida and qualified to practice in this court, request that this court admit *pro hac vice* Laurance M. Frazen of the law firm Bryan Cave Leighton Paisner (“Visiting Attorney”). Visiting Attorney is admitted to practice and currently in good standing in the State of Missouri and Illinois, the United States District Court for the Southern District of Illinois, The United States District Courts for the Eastern and Western Districts of Missouri, and the United States Bankruptcy Court of the District of Kansas, and qualified to practice in this court, who proposes to act as counsel for Interested Parties Conviva Medical Management, LLC (“CMM”) and Clinical Care Medical Centers asset acquisition (“CCMD”) collectively (“Client”) in the case listed above and in any adversary proceedings therein in which the Visiting Attorney appears on behalf of the Client.

1. I am aware that the local rules of this court require a member in good standing of the bar of the United States District Court for the Southern District of Florida and qualified to practice in this court to act as local counsel for such Client, unless the court specifically authorizes an attorney not so admitted to act as local counsel. I understand that

local counsel is required to participate in the preparation and presentation of, and accept service of all papers in, the case identified above and any adversary proceedings in which the Visiting Attorney appears on behalf of such Client.

2. I am a member in good standing of the bar of the United States District Court for the Southern District of Florida and qualified to practice in this court and agree to act as local counsel for the above-referenced Client in this case and in any adversary proceedings in this case in which the Visiting Attorney appears on behalf of the Client. I understand that I am required to participate in the preparation and the presentation of the case above and any such adversary proceedings and to accept service of all papers served in such case and proceedings.

3. The order granting this Motion will serve to admit the Visiting Attorney to practice in the case noted above on behalf of the Client and in any adversary proceedings in that case in which the Visiting Attorney appears on behalf of such Client. I understand that if I decline to serve as local counsel in any such adversary proceeding, separate local counsel must file an additional *Motion to Appear Pro Hac Vice*, and that absent such separate motion and an order of this court approving the same I will continue to act as local counsel for the Client in all such proceedings.

4. The affidavit of the Visiting Attorney required under Local Rule 2090-1(C)(2) is filed concurrently herewith as **Exhibit A**. A proposed order is also attached as **Exhibit B**.

WHEREFORE, upon the foregoing representations, Movant respectfully requests an order of this court authorizing the Visiting Attorney to appear *pro hac vice* in this case and in any adversary proceedings in this case on behalf of the Client and indicating Movant as local counsel for the Client, and for such other and further relief as may be just.

Dated: October 14, 2024

Respectfully Submitted,

AKERMAN LLP

201 East Las Olas Blvd., Suite 1800
Fort Lauderdale, Florida 33301
Telephone: (954) 463-2700
Facsimile: (954) 463-2224

By: /s/ Michael I. Goldberg
Michael I. Goldberg, Esq.
Florida Bar No. 886602
michael.goldberg@akerman.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via the Court's CM/ECF System to all parties who receive notice by electronic mail through the Court's CM/ECF system on October 14, 2024.

By: /s/ Michael I. Goldberg
Michael I. Goldberg, Esq.

EXHIBIT “A”

Affidavit of Proposed Visiting Attorney

I, Laurence M. Frazen, am a member in good standing of the bar of the State of Missouri and the bar of the State of Illinois. I am a member in good standing of the bar of the United States District Court for the Southern District of Illinois, The United States District Courts for the Eastern and Western Districts of Missouri, and the United States Bankruptcy Court of the District of Kansas. I certify that I have never been disbarred, that I am not currently suspended from the practice of law in the State of Florida or any other state, and that I am not currently suspended from the practice of law before any United States Court of Appeals, United States District Court, or United States Bankruptcy Court.

I hereby request authority to appear *pro hac vice* in this case and in any adversary proceedings in this case on behalf of the Client, Conviva Medical Management, LLC and Clinical Care Medical Centers asset acquisition. I designate Michael I. Goldberg (“Local Counsel”), who is qualified to practice in this court, as local counsel for the Client. I understand that Local Counsel is required to participate in the preparation and the presentation of the case above and any adversary proceedings in which I appear on behalf of such Client and accept service of all papers served in such case and proceedings, unless and until other local counsel is designated and accepts such designation by filing a separate *Motion to Appear Pro Hac Vice* on my behalf.

I certify that I am familiar with and shall and shall be governed by the local rules of this court, the rules of professional conduct and all other requirements governing the professional behavior of members of the Florida Bar.

Dated: October 14, 2024

/s/ Laurence M. Frazen

Laurence M. Frazen

Missouri Bar No. 31309

Bryan Cave Leighton Paisner

One Kansas City Place

1200 Main Street, Suite 3800

Kansas City, MO 64105-2122

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EXHIBIT “B”

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION
www.flsb.uscourts.gov

In re:

Chapter 11 Cases

MBMG Holding, LLC,

Case No. 24-20576-CLC

Debtor.

_____ /

ORDER ADMITTING ATTORNEY LAWRENCE M. FRAZEN *PRO HAC VICE*

THIS MATTER came before the court on the *Ex Parte* Motion to Appear Pro Hac Vice [ECF NO. ____] concerning Lawrence M. Frazen. The court having reviewed the motion and good cause appearing, it is

ORDERED that Lawrence F. Frazen (“Visiting Attorney”) may appear before this Court pro hac vice as counsel for Interested Parties Conviva Medical Management, LLC (“CMM”) and Clinical Care Medical Centers asset acquisition (“CCMD (“Client”)) in this case and in each adversary proceeding in this case where Visiting Attorney appears on behalf of Client, subject to the local rules of this court. Visiting Attorney shall include the certification required

by Local Rule 9011-4(B)(2) in all papers filed with this court. Visiting Attorney may apply to become a registered user of CM/ECF in this district with full filing privileges in this case and in any other case in which this court has entered an order admitting Visiting Attorney *pro hac vice*. The following attorney (“Local Counsel”) is designated as the attorney qualified to practice in this court with whom the court and other counsel may readily communicate and upon whom papers may be served:

Michael I. Goldberg, Esq.
Akerman LLP
201 East Las Olas Boulevard, Suite 1800
Fort Lauderdale, FL 3301
Telephone: (954) 463-2700
Facsimile: (954) 463-2224
michael.goldberg@akerman.com

Local Counsel Eyal Berger shall act as the local attorney as required by Local Rule 2090-1(C)(2) in this case and in each adversary proceeding in this case in which the Visiting Attorney appears on behalf of the Client. If Local Attorney declines to serve as the local attorney in any such adversary proceeding, a separate local attorney must file an additional *Motion to Appear Pro Hac Vice*, and absent such separate motion and an order of this court approving the same Local Attorney will continue to act as local attorney for the Client in all such proceedings.

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Submitted by:

Michael I. Goldberg, Esq.
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Fort Lauderdale, FL 3301
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michael.goldberg@akerman.com

*Local Counsel for Interested Parties Conviva Medical Management, LLC (“CMM”) and
Clinical Care Medical Centers asset acquisition (“CCMD”)*

[Attorney Michael I. Goldberg shall serve a copy of this order on all required parties and shall file a certificate of service thereof.]